

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 24, 1990

Michael R. Anderson
Director of Marketing
HEMOX, Inc.
128 Tomahawk Drive
Indian Harbour Beach, Florida 32937

Dear Mr. Anderson:

This letter responds to our recent telephone conversations and to the informational material and samples of sharps containers you submitted to EPA. In your letter, you asked EPA to evaluate the sharps containers that HEMOX manufactures. The containers that HEMOX manufactures are made of a type of coated fiberboard.

I would like to begin my response by thanking you for sending EPA the samples and literature. It is helpful as well as interesting to review new products in the waste management industry. The sharps containers you sent EPA appear to be as leak resistant and puncture resistant as other sharps containers that EPA has reviewed. This is not a technical evaluation of your product, however.

As I mentioned to you on the telephone, EPA has not issued technical standards for sharps containers, and has not adopted standard test methods for evaluating whether a container is leak resistant or puncture resistant. Rather, EPA has issued a more general performance standard that applies to containers that are shipped off-site for disposal. That standard requires that sharps be packaged in rigid, leak resistant, and puncture resistant containers that are properly labeled and marked prior to shipment off-site.

This standard does not apply to containers, such as those you sent EPA, that are used at the point of generation, such as in an examining room. The Occupational Safety and Health Administration has jurisdiction over waste management practices within facilities. EPA's performance standards would apply, however, if the sharps container were shipped off-site for disposal by itself (and not contained within a larger container). The packaging requirements that apply to shipments of medical waste, as well as other aspects of EPA's medical waste demonstration program are explained in the March 24, 1989 issue of the Federal Register (54 FR 12326-12395).

If you wish to discuss this matter further, please contact me at (202) 475-8551.

Sincerely,

Michaelle Wilson
Chief
Special Projects Characterization Section

FaxBack # 11530